

## INTEROFFICE MEMORANDUM

DATE:

April 10, 2002

TO:

Jennifer Thompson, K-H, B707C, X6285

FROM:

Karan North, K-H/ESS, T130C, X9876

SUBJECT:

DETERMINATION FOR BLDG 707 CARGO STORAGE PADS - KN-050-02

I have reviewed the project to install asphalt pads, that will as serve as staging areas for bulk storage waste containers, and storage of empty cargo containers. The pads will be located outside of Bldg 707, as described in the revised environmental checklist (although note that the Pad numbers referenced below are taken from the original map). Environmental compliance issues for this project are noted in the following paragraphs.

## Surface water

Block storm drains (e.g., with drain mats or thick plastic) at Pad 1 when leveling or asphalt operations are being conducted in the area of the storm drains to eliminate the potential for soils, debris, and oils from entering the storm drain system. During operation and fueling of generators, compressors or pumps, use secondary containment so diesel fuel and machine fluids are not released to storm water drainages. Ensure that secondary containment is large enough to handle the entire liquid contents of equipment.

Incidental Waters must be dispositioned per procedure 1-C91-EPR-SW.01, Control and Disposition of Incidental Waters (Kevin Hult, X4985).

On the southernmost and easternmost corners of Pad 3, place straw bales or silt fence on the downgradient side to prevent sediments, asphalt, and oils from entering and clogging the nearby culvert. At the completion of the project, slopes and disturbed soil areas must be protected from long-term erosion by vegetating, paving, erosion resistant crushed rock surfacing or other acceptable means.

Cover roll-off waste containers at the end of the work day and when rain or snow events occur. This Best Management Practice minimizes or prevents storm water from contacting potential pollutants in the trash.

## Groundwater

A replacement well will need to be installed in the immediate vicinity of existing well P218089 (which will be abandoned). The location will be based on a site walkdown with Excavation Specialists, and personnel from the Water Programs and Bldg 707. The replacement well will be

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installed with the Geoprobe as a flush-mount well. Note that there is a three-day "statutory limit" on the selected location; if well installation is not started within three days, the walkdown will need to be repeated.

Four flush-mount wells are also located near Pads 1, 2, and 3. Well 00300 is south of Pad 1, near the nitrogen tanks at the southeast corner of Bldg. 707. On the west side of Bldg 707, Well 60499 is located north of Pad 2, and Well 60599 is south of Pad 2. On the south side of Bldg 707, Well 61399 is located just south of Pad 3. While activities described in the checklist should not directly affect these wells, project personnel must ensure that equipment, support vehicles, or other heavy objects are not positioned or dropped directly on top of the wells, as this could destroy the wells. Questions regarding groundwater wells should be directed to John Boylan (X5182) or Ellen Warp (X4587).

## Other

A soil disturbance permit will be necessary. Excess soils should be managed according to the RSOP for Asphalt and Soil Management. Greg Sollner (X3541) must be advised in advance (and approve) stockpiling of soil. Excess soil stockpile erosion covers must be maintained in good condition as long as a stockpile exists.

Although the current plans are to use asphalt, if concrete is to be purchased, it must meet recycled content guidelines (Tamar Krantz, X4374). Also note that rinsing or dumping of cement trucks or mixers is not allowed on-Site.

With regard to NEPA documentation, I find that the Site Standing CX for Plant Wide Routine Maintenance (RFFO/CX 13-96) (B1.3) provides coverage for this project. No further NEPA review or documentation of the project is necessary and, from a NEPA perspective, the project may proceed.

If the scope of the project changes, please contact me so that we can review the changes for compliance. Please contact Niles Jokela (X8132) if you have questions or need additional information.

cc:

Ted Hopkins, K-H Richard Lessor, SSOC file



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